1 MICHAEL W. DOTTS, Esq. O'Connor Berman Dotts & Banes Second Floor, Nauru Building P.O. Box 501969 **Saipan, MP 96950** Telephone No. (670) 234-5684 4 Facsimile No. (670) 234-5683 5 Attorneys for Plaintiff Antonio S. Camacho 6 IN THE UNITED STATES DISTRICT COURT 7 FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS 8 9 ANTONIO S. CAMACHO **CIVIL CASE NO. 05-0043** 10 Plaintiff, 11 VS. PLAINTIFF'S PROPOSED JURY 12 COMMONWEALTH OF THE **VOIR DIRE QUESTIONS** 13 NORTHERN MARIANA ISLANDS, DEPARTMENT OF PUBLIC LANDS, 14 successor to the Marianas Public Lands Date: December 4, 2006 **Authority, and DEPARTMENT OF** Time: 9:00 a.m. 15 PUBLIC WORKS, 16 Defendants. 17 18 COMES NOW the Plaintiff, Antonio S. Camacho, by and through counsel, and requests 19 20 that the Court ask the following voir dire questions of the prospective jurors, in addition to the 21 Court's usual questioning, to aid in the jury selection process: 22 23 1. Question: Does anyone work with math in their job? 24 If one or more jurors indicate that they do work with math, 25 the Plaintiff requests the Court to make further inquiry into their 26 use of math at work. 27 28

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• If none of the prospective jurors indicate that they work with math in their profession, then the Plaintiff requests the Court to inquire if anyone feels they *cannot* handle simple math problems such as multiplication and division.

- 2. Question: An issue in this case involves valuing property at the time it was taken. Property values on Saipan have recently fallen. As jurors, can you follow an instruction to value Plaintiff's property at the time it was taken, and not what you think it might be worth now?
- 3. Question: it is well known that the Commonwealth is suffering from economic hard times now. The Plaintiff will be asking you for an award of money to be paid to him by the government Defendants. As jurors, can you put out of your mind the economic problems we are facing today and award a sum of money to the Plaintiff based solely on the evidence that is presented?

Dated: December 2, 2006.

Respectfully submitted,

O'CONNOR BERMAN DOTTS & BANES Attorneys for Plaintiff Antonio S. Camacho

By: ____/s/___ Michael W. Dotts (F0150) $K:\label{eq:condition} K:\label{eq:condition} K:\label{eq:condition} I Camacho\label{eq:condition} PL\draft\Jury\ Voir Dire-061202-jom.doc$